

UNITED STATES DISTRICT COURT

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Middle District of Alabama

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Eastern Division

DEBRA P. HACKETT, CLK

U.S. DISTRICT COURT

MIDDLE DISTRICT OF ALA.

Jeanetta Springer, Pro Se, and Jacob C. Springer,  
Pro Se

Case No. 2:17-cv-693-MHT

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Wells Fargo Bank, N.A. (As successor of Wachovia Bank, N.A./f/k/a Southtrust Bank, N.A.); Sirote & Permutt, PC; State of Alabama Department of Revenue, Vernon Barnett, Commissioner

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Jeanetta Springer and Jacob C. Springer
Street Address	195 Cynthia Circle
City and County	Roanoke, Randolph
State and Zip Code	AL 36274
Telephone Number	256-375-2862 and 334-338-5004
E-mail Address	

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	Wells Fargo Bank, N.A.
Job or Title <i>(if known)</i>	Successor of Wachovia Bank, N.A., f/k/a Southtrust Bank, N.A.
Street Address	420 Montgomery Street
City and County	San Francisco, San Francisco
State and Zip Code	CA 94104
Telephone Number	
E-mail Address <i>(if known)</i>	

**Defendant No. 2**

Name	Sirote & Permutt, P.C.
Job or Title <i>(if known)</i>	
Street Address	2311 Highland Avenue S, P.O. Box 55727
City and County	Birmingham, Jefferson
State and Zip Code	AL 35205
Telephone Number	205-930-5100
E-mail Address <i>(if known)</i>	

**Defendant No. 3**

Name	Vernon Barnett, Commissioner of Revenue
Job or Title <i>(if known)</i>	State of Alabama Department of Revenue
Street Address	50 North Ripley Street
City and County	Montgomery, Montgomery
State and Zip Code	AL 36132
Telephone Number	334-353-8096
E-mail Address <i>(if known)</i>	

**Defendant No. 4**

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Due Process Guarantee in Amendment V; Amendment VII (Jury Trial in Civil Cases); Amendment XIV Section 1

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

#### 1. The Plaintiff(s)

##### a. If the plaintiff is an individual

The plaintiff, *(name)* Jeanetta Springer and Jacob C. Springer, is a citizen of the State of *(name)* Alabama

##### b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_ and has its principal place of business in the State of *(name)* \_\_\_\_\_

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

#### 2. The Defendant(s)

##### a. If the defendant is an individual

The defendant, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_. Or is a citizen of *(foreign nation)* \_\_\_\_\_

b. If the defendant is a corporation

The defendant, (name) Wells Fargo Bank, N.A., is incorporated under the laws of the State of (name) Delaware, and has its principal place of business in the State of (name) California.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

We lost both real property and peace of mind due to the violation of our Constitutional Rights and the laws of this nation mentioned above.

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III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A foreclosure proceeding was held at Circuit Court of Randolph County, Alabama in order to pressure me, Jacob C. Springer, into signing a check issued by the Circuit Court of Randolph County, Alabama in another civil action. The first time this was attempted it was on "deceased property". The second time was because of "late payments". The Evidence clearly showed the house had not reached foreclosure status, however, this evidence was not presented due to violation of due process. The house was unlawfully siezed by the State of Alabama Department of Revenue by issuing a writ to seize the property for \$998.69, even though I (Jacob Springer) never had an account with Wells Fargo Bank or had any dealings with them.

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IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The House, located on 619 Lafayette Highway, Roanoke, AL 36274, needs to be returned to us and compensation for any damage and destruction to the house with the present state it is in. Compensatory damages are also being sought for the violation of our Constitutional Rights and abuses by the state actors under color of law. Punitive damages are also being sought to prevent this from happening again, and a jury trial is being sought.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 13 OCT 2017

Signature of Plaintiff

Printed Name of Plaintiff

  
Jeanetta Springer, Pro Se and Jacob C. Springer, Pro Se

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

**The Defendant, Sirote & Permutt, PC, is incorporated under the laws of the State of Alabama and has its principal place of business in Birmingham, Alabama.**

**The Defendant, State of Alabama Department of Revenue, is incorporated under the laws of the State of Alabama and has its principal place of business in Montgomery, Alabama.**